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March 18, 2025

**BY ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corp., et al v. JOY ROCKWELL ENTERPRISES, INC. et al* (No. 1:24-cv-04389-HB) – Joinder in Defendants’ Consolidated Motion to Dismiss Plaintiffs’ Complaint**

Dear Judge Bartle:

This firm represents the defendant Joy Rockwell Enterprises, Inc. (“Defendant”) in the above-referenced matter. We write to advise the Court that Defendant joins the Consolidated Motion to Dismiss Brief, which was filed under Dkt. No. 59 in the action captioned as *Atlas Data Privacy Corp. v. DM Group Inc.*, Case No. 24-cv-04075-HB, Dkt. No. (TBP) (the “Consolidated Motion to Dismiss”). For the reasons set forth in the Consolidated Motion to Dismiss, Defendant respectfully requests that the Court grant the motion and dismiss Plaintiffs’ Complaint in this matter with prejudice.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kelly M. Purcaro".

KELLY PURCARO